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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
ROBERT EVANS MAHLER,  
Defendant.

Case No. 3:16-cr-00105-AA

**DECLARATION OF SAMUEL C.  
KAUFFMAN (Re: Motion to  
Modify Conditions of Release)**

I, Samuel C. Kauffman, declare that the following statements are true to the best of my knowledge, information and belief:

1. I am counsel for the defendant Robert Mahler.
2. I make this declaration in support of our Motion to Modify

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Conditions of Release)**  
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Conditions of Release to Allow International Travel to allow Mr. Mahler to travel to Mumbai, India to undergo shoulder replacement surgery.

3. On March 23 and April 27, 2017, the Court allowed our motions to return Mr. Mahler's passport and to modify his conditions of release to allow him to apply for renewal, in anticipation of his proposed shoulder surgery in Mumbai, India.

4. Mr. Mahler has now received his renewed passport and an "e-visa" from the Government of India, allowing him to travel to India between May 31, 2017 and October 2, 2017. Ex. 1.

5. Mr. Mahler intends to undergo shoulder replacement surgery at the Mumbai Location of the Gleneagles Global Hospitals Group through We Care Health Services. The surgery will be performed by Dr. Sujit Korday on June 28 or 29, 2017. Ex. 2.

6. Mr. Mahler proposes to leave Portland on June 24, 2017 and return no later than July 18, 2017 to begin his recovery and rehabilitation.

7. Mr. Mahler will surrender his passport to U.S. Pretrial Services upon his return from India.

8. Accordingly, we respectfully request that the Court modify Mr. Mahler's conditions of release to allow his international travel to Mumbai, India

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during the time-period proposed.

9. Assistant United States Attorney Greg Nyhus told me that he stands by his objection previously stated.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 8<sup>th</sup> day of June 2017.

/s/ Samuel C. Kauffman  
SAMUEL C. KAUFFMAN